

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: CHAPTER 13

YVETTE GARNETT

Debtor BANKRUPTCY NO. 20-13108

**CITIZENS BANK, N.A.
Movant**

**DEBTOR'S ANSWER TO MOTION FOR RELIEF FROM THE AUTOMATIC
STAY FILED BY CITIZENS BANK, N.A.**

COMES NOW DEBTOR, YVETTE GARNETT, by and through his attorney, THOMAS R. SMITH, JR., and hereby submits the following responses to the numbered paragraphs in Creditor Citizen Bank, N.A.'s Motion for Relief:

1. Admitted.
2. Admitted.
3. Neither admitted nor denied. Debtor avers that the amount in attorney's fees and costs assessed by Movant is unreasonable.
4. Denied. Debtor specifically denies that Movant is entitled to relief to foreclose.
5. Denied. Debtor specifically denies that Movant is entitled to relief from the stay.

WHEREFORE, Respondent respectfully requests that Movant's Motion to Relief from the Automatic Stay be denied.

FREEDMAN AND LORRY, P.C.

/s/ Thomas R. Smith, Jr.
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Counsel for the Debtor

CERTIFICATION

Respondent certifies, under penalty of perjury, that the matters stated herein are true and correct to the best of his knowledge, information, and belief.

DATE: November 18, 2021

ATTORNEYS FOR DEBTOR

/s/ Thomas R. Smith, Jr.
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